

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Jason W. Carter

Debtor

Jason W. Carter

Plaintiff

vs.

Toyota Motor Credit Corporation

Defendant

NO. 18-24646-CMB

CHAPTER 13

Adversary No. 19-02140-CMB

**STIPULATION AND ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, Defendant's claim is secured by a 2011 Toyota Venza., VIN:  
4T3BK3BB6BU054002;

WHEREAS, on February 19, 2019, Defendant filed a proof of claim in the total amount of \$17,203.86, asserting a secured claim in the amount of \$14,044.29, with pre-petition arrears in the amount of \$889.52, and with an annual interest rate of 6.340000%. (Claim 4-1);

WHEREAS, Debtor's Chapter 13 Plan dated November 30, 2018 proposed to pay a modified principal balance of \$8,100.00 on Defendant's secured claim plus interest at the rate of 6.0%;

WHEREAS, Defendant has filed an objection to Debtor's Chapter 13 Plan (Doc. 25);

WHEREAS, Debtor filed a Complaint to Determine Secured Status in this matter seeking to have the amount of Defendant's claim reduced to \$8,100.00.

WHEREAS, Defendant has filed an answer to Debtor's complaint;

WHEREAS, the parties have reached an agreement with regard to the treatment of Defendant's secured claim.

It is therefore Stipulated and agreed as follows:

1. The amount of Defendant's claim secured by the 2011 Toyota Venza., VIN: 4T3BK3BB6BU054002 is \$10,500.00.
2. Debtor shall pay the sum of \$10,500.00 with interest at the rate of 6.00% on Movant's secured claim filed at Claim 4-1.
3. Defendant's objection to confirmation of the Debtor's Chapter 13 Plan is withdrawn.
4. Debtor's Complaint to Determine Secured Status is withdrawn.

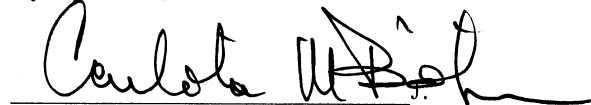
Consented to by:

/s/ Daniel R. White, Esquire  
Daniel R. White, Esquire  
Zebley, Mehalov & White, P.C.  
Attorney for Debtor  
18 Mill Street Square  
P.O. Box 2123  
Uniontown, PA 15401  
Phone: 724-439-9200  
dwhite@zeblaw.com

/s/ James C. Warmbrodt, Esquire  
James C. Warmbrodt, Esquire  
KML Law Group, P.C.  
Attorney for Defendant  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: 215-627-1322  
jwarmbrodt@kmlawgroup.com

It is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

By the Court,



FILED  
10/10/19 3:06 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

**Certificate of Notice Page 3 of 3**  
United States Bankruptcy Court  
Western District of Pennsylvania

Carter,  
Plaintiff

Adv. Proc. No. 19-02140-CMB

Toyota Motor Credit Corporation,  
Defendant

**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: dsaw  
Form ID: pdf900

Page 1 of 1  
Total Noticed: 5

Date Rcvd: Oct 10, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 12, 2019.

pla +Jason W. Carter, 531 Madison Drive, Smithfield, PA 15478-1265  
dft +Toyota Motor Credit Corporation, KML Law Group, P.C., c/o James C. Warmbrodt, Esquire,  
701 Market Street-Suite 5000, Philadelphia, PA 19106-1541

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
ust +E-mail/Text: ustpreregion03.pi.ecf@usdoj.gov Oct 11 2019 02:35:50

Office of the United States Trustee, Liberty Center., 1001 Liberty Avenue, Suite 970,  
Pittsburgh, PA 15222-3721

ust +E-mail/Text: USTPRegion03.HA.ECF@USDOJ.GOV Oct 11 2019 02:35:50 United States Trustee,  
228 Walnut Street, Suite 1190, Harrisburg, PA 17101-1722

ust +E-mail/Text: ustpreregion03.ph.ecf@usdoj.gov Oct 11 2019 02:35:50 United States Trustee,  
Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107-4405  
TOTAL: 3

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 12, 2019

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 10, 2019 at the address(es) listed below:

Daniel R. White on behalf of Plaintiff Jason W. Carter zmwchapter13@gmail.com,  
gianna@zeblaw.com;sheila@zeblaw.com;r63228@notify.bestcase.com  
James Warmbrodt on behalf of Defendant Toyota Motor Credit Corporation  
bkgroup@kmlawgroup.com

TOTAL: 2